

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE - WESTERN DIVISION

State Farm Fire and Casualty Company

as subrogee of Talus Properties, Inc.

and Melrose Midtown, LLC

Plaintiff

C.A. 2:19-cv-2330-JPM

v.

Jose Alfredo Sandoval

Defendant

and

Talus Properties, Inc. and

Melrose Midtown, LLC

Plaintiff

v.

Jose Alfredo Sandoval

Defendant

Joint Motion to Amend Scheduling Order

All parties believing it to be necessary, they now request that the Court extend the deadlines contained in the current Scheduling Order [ECF No. 27] sixty days. Two main reasons for this request. First, the parties remain engaged in an ongoing, joint mediation with *Talus Properties Inc. v. State Farm Fire and Casualty Company* (No. 2:19-cv-02457-MSN in this Court) and, to some extent, have deferred discovery in the good faith belief that they can resolve this matter. And second, the unprecedented and unforeseen effects of the COVID-19 outbreak have slowed aspects of discovery considerably.

Monday, April 20, 2020
Knoxville, Tennessee

Respectfully submitted,
QUIST, FITZPATRICK & JARRARD PLLC

By: /s/ Michael A. Durr
Michael A. Durr (TBA 26746)
800 South Gay Street, Suite 2121
Knoxville, Tennessee 37929
Direct: (865) 312-0440
E-Mail: mdurr@qcflaw.com
Attorney for Plaintiff State Farm Fire and Casualty Company

LAW OFFICES OF LIBBY & NAHMIAS

By: /s/ Adam M. Nahmias
Adam M. Nahmias (TBA 16227)
5384 Poplar Ave., Suite 410
Memphis, Tennessee 38119
Direct: (901) 343-0777
E-Mail: adam@lnlawmemphis.com
*Attorney for Plaintiffs Talus Properties, Inc.
and Melrose Midtown, LLC*

CLAYTON-LITTLE, PLLC

By: /s/ John Little
John Little (TBA 14941)
325-A North Parkway
Jackson, Tennessee 38305
Direct Line: (731) 300-6261
Fax: (731) 300-6364
Email: jlittle@clayton-little.com
Attorney for Defendant Jose Alfredo Sandoval

Certificate of Service

I hereby certify that on Monday, April 20, 2020 that I served this document through the Court's electronic filing system and by electronic mail to the following counsel of record through the following e-mail addresses:

- John Little
jlittle@clayton-little.com
- Adam Nahmias
Adam@lnlawmemphis.com

By: /s/ Michael A. Durr
Michael A. Durr